

United States District Court for
The Western District of Pennsylvania
Case No.

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SEP 11 2018

U.S. DISTRICT COURT
E. DIST. OF PENNSYLVANIA

Dana W. Wiley,
Plaintiff,

V.

World Wrestling Entertainment
CEO: Vince McMahon and John Due
D-Generation X / NWO Wrestling employees,
Defendants;

18-1207

Plaintiff's complaint for (1) Federal Trademark Infringement,
15 u.s.c 1114; (2) Fair use copyright trademark agreement to advertise, promote and
distribute, without unfair royalty payment pursue of unfair competition,
15 u.s.c 1125(a); (3) Deceptive And Unfair Trade Practices, F.S.A 501, (4) Breach of
Contract.

I. Introduction.

This matter concerns the trademark of the defendants; CEO, Vince McMahon and
John Due of the D-Generation X / New World Order wrestling employees for failure
to release the official copyright contract hereto plaintiff, Dana Wiley along with
royalty payment for above work titled: D-Generation X / New World Order Merchandise
in support of Exhibit(A) page 1 of 6.

2. Introduction.

Dana Wiley brings this action to secure relief under federal and Pennsylvania
state law. Dana Wiley seeks: (a) Temporary Preliminary and Permanent injunctions;
pursuant to 15 u.s.c 1117(a)
requiring the defendants to release the official fair use copyright contract
(B) royalty payment damages and (C) defendant pay cost of this action and any legal
fee's.

II. Parties

1. Plaintiff, Dana Wiley is a public residence under the laws of the state of
Pennsylvania at: 531 Case Street Apt-9 Rochester, Pa 15074
cell phone: 724/558/7679. He is in good standing with the federal and state
Pennsylvania laws. He has exhausted all federal and state remedies and done
everything necessary and proper to bring this lawsuit.

2. Defendants based on information and belief. World Wrestling Entertainment CEO;
Vince McMahon John Due of the D-Generation X / New World Order wrestling employees
has jurisdiction of this matter and is located at above address:
1241 East Main Street Stamford, CT 06902

III. Jurisdiction And Venue

This Court has original jurisdiction pursuant to the 5th amendment under 15 u.s.c
1121(a)
(action arising under the Lanham Act) and 28 u.s.c 1331, 1338(a) (federal question)
in that this case arises under the Trademark Laws of the United States,
15 u.s.c 1051-1127.

2. This Court has jurisdiction pursuant to the 5th amendment under 28 u.s.c 1338(b)
in accordance with the principles of pendant jurisdiction in that said claims are
joined with substantial and related claims under the Trademark of the

United States, 15 U.S.C. 1051-1127.

Statement of Facts.

1. Plaintiff, Dana Wiley signed a fair use copyright contract with the above defendants; World Wrestling Entertainment: CEO; Vince McMahon John due of the D-Generation X / New World Order wrestling employees on August 21, 1995 in front of the Lawrence County Courthouse of New Castle, Pa. Officially after Dana Wiley was sentenced in an unrelated criminal case No. 1144/1994 for the above trademark work titled (D-Generation X / New World Order merchandise).

2. These defendant's over 20 plus years has ignored nor responded to numerous cease and desist notices, similar as exhibit (A) Page 1 of 6 that plaintiff, Dana Wiley submitted to the defendant's on July 12, 2018.

3. These defendant's has failed to release a copy of the fair use copyright contract hereto plaintiff, Dana Wiley for the above trademark work titled: D-Generation X and New World Order Merchandise along with a royalty payment.

Conclusion.

Heretofore on above day of September 10, 2018 Plaintiff, Dana Wiley hereby seeks (a) Temporary preliminary and permanent injunctions pursuant to 15 U.S.C. 1117(a) (A) Court ordering the defendants to respond to the allegations of these facts in support of exhibit (A) page 1 of 6 within (30) days.

(B) Court order the defendant's to release official copy of the fair use copyright contract hereto Plaintiff, Dana Wiley.

(C) Court order the defendant's to pay royalty damages hereto plaintiff, Dana Wiley in the amount of \$75-million no less than \$10-million heretofore above trademark work titled (D-Generation X / New World Order Merchandise).

(D) require the defendant's to pay cost of this action or any legal fees by the court's.

The said allegations are hereby true and correct in accordance with the United States laws of the U.S. Constitution of perjury the above defendant's has been hereby pro'se served by the clerk of courts of the United States Federal Court of Western Pennsylvania and plaintiff, Dana Wiley.

First class certified mail
on above Date: September 10, 2018

Dana Wiley, Plaintiff
531 Case Street Apt-9
Rochester, Pa 15074
cell phone No. 724-558-7679

Dana Wiley

World Wrestling Entertainment
CEO; Vince McMahon John Due of the
D-Generation X / New World Order
wrestling employees
1241 East main street
Stamford, CT 06902

EXHIBIT (A) Page 1 of 6

CEASE AND DESIST NOTICE
REQUEST FOR ROYALTY PAYMENT
FOR INFRINGEMENT OF COPYRIGHT

Dear;World Wrestling Entertainment
CEOP:Vincent McMahon And All
D-GenrationX/NWO Wrestling Employees

Case No.7/12/2018

"STATEMENT OF Facts"

It has become to my attention I hereby confirm that (WWE.ET-AL) wrongfully infringed my right's in accordance to section;107 of 1988 Campbell Vs. Acuff-Rose Music,Inc and Automatic Radio Co Vs.Hazeltine Research,Inc.,339 U.S. 827(1950) herefor the copyright work entitled(D-GenrationX/NWO merchandise).

STATEMENT OF ARGUMENT

(WWE.ET.AL) over the course of 20-year's they have officialy failed to provide I, Dana W.Wiley a royaltya payment for the above work entitled. (D-GenrationX/NWO merchandise) you have all so ignored several letter's Dated:3/9/2011., from I,Dana W.Wiley seeking royaltya payment of sum \$3-million a year for life time payment; along with a copy of the official fair-use Law act of sect,107(1988)5th amendment; copyright contract we agreed upon on the above date of August 21,1995.

STATEMENT OF COLLUSION

I,Dana W.Wiley; seek's the royaltya settlement payment of \$75-million no less then \$10-million herefrom (WWE.ET.AL) for the above work entitled (D-GebrationX/NWO Merchandise) WWE.,ET.AL) has officialy (30) Day's to resolve this matter with I,Dana W.Wiley in accordance of Privacy law-Act of 1974,5 u.s.c 552a, if (WWE.ET.AL) failes to resolve this matter within (30)Day's you hereby waive all right's and officialy confirm the said foregoing is true and correct pursue to the penalty of perjury section,(18 u.s.c 1621).

SINCERELY TURLY YOUR'S

DANA W.WILEY;
531 CASE STREET APARTMENT#9
ROCHESTER,PA 15074
CELL PHONE NUMBER#724/558/7679
EMAIL:williamdana806@yahoo.com
wileydana07@gmail.com
Date:7/12/2018

Dana W. Wiley

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MR. DANA, W. WILEY CT-9123

Date Birth 3/22/1977

Place Birth Detroit Mich

SSI No. 173-58-3176

home Address

1115. MILTON ST New Castle PA. 16101 or

SCI. Greene 175 Progress Drive Waynesburg PA. 15370

Phone No. 724-947-0997 or 724-652-5935

The information is I DANA, W. WILEY CT-9123

AKA Ghetto, D

True and correct Identification under
U.S. CONST of PENALTY Perjury Law.

Grievance complaint
request under section 703(H) Law and
release Documents

here and To The employer
CEO of World Wrestling Entertainment

Fax No. 203-359-5151

Phone No. 203-352-8600 or 212-398-1815

DATE. 3/9 /2011

Page 2 of 1

Date month and Year EMPLOYED BY WWE

7th 8 and 9 DAY October 1994

21th DAY August 1995

September 1996 and October 2, 1998

I am as to date still EMPLOYED BY WWE

Yes on 9 DAY of march 2011

I beem EMPLOYED BY WWE for

seventeen Years

WWE require MY Job to be superstar wresler

write and create music song sounds and

Design The Degeneration X and Nwo ET-AL clothing

line with investment of seventy \$75 million

DOLLARS into WWE stock market along with

TNA Impact

WWE require to Pay me over Three^{\$}(3) or more
million DOLLARS a Year

The employer of WWE employees have The

Copy rights of my Name Degeneration X and

Nwo. ET-AL

Page 3 of 1

my employer and employees of WWE has
copies several Entertainment Photo News
articles of I DANA.W.WILEY CT-9123
AKA Ghetto.D

with Eric Wright AKA Eazy, E et-AL

That was taken by News Dept of Ohio
Newcastle PA-USA Today and Entertainment
weekly from Southern Park Mall Boardman
Ohio and Old Downtown Newcastle PA Mall
Threw out all 1994 and 1996 of 1998
from Yo-MTV Raps and BET Rap City
Ladies night show

Statement of Request

I DANA.W.WILEY CT-9123 AKA Ghetto.D

on 9 Day of March 2011

is requestion to my employer from WWE

who has multitude million Dollar

copy right and Seventy five \$75 million Dollar

US.Treasury WWE and TNA impact

stock market investment contract agreement
with me as of todate

will cash pay me fifty one \$51 million Dollar

Pursue section 703(H) Payment Law

with in next fifteen (15) days

follow by lifetime cash Payments of

Three \$3 million Dollars a Year.

Page 4 of 1

Therefore my employer from WWE has the statute time fifteen (15) day to make that fiftyone \$51 million dollar payment with the release several Entertainment Photo News article of me with Eric Wright AKA Eazy E. et and The Government Documents involving lawsuit Lisa Lopez AKA Lefteye filed on behalf my competence here and on The US IRS Treasury Dept back in September 1996 involving them Treasury checks formal President Administration Bill W. Clinton first class mail to me back in October 1994 for sum seventy five \$75 million dollars a piece which is in your and other Government official Possession as of today if my employer from WWE fail to comply with in that statute time I will file my complaint here and to US EEOC of Western PA William S. Moorhead and seek the compensation relief. I request from my employer in this complaint.

Page 5 of 1

I DANA.W.WILEY CT-9123 AKA ghetto.D
declare by us.const of Law
Pursue to PenALTY of PerJury The said
facts are True and correct That my EMPLOYER
from world wrestling ENTertainment was Given
fax or first CLASS mail notificate
on 9 Day and month March 2011
from address
111 S. MILTON ST New CASTLE PA 16101 and
175 Progress Drive WAYNESBURG PA 15370

Sincerely
Mr. Dana.W. Wiley

Date / / 2011

Certificate of Service

I hereby certify that a true copy of the foregoing Consent was served (by mail) (by hand delivery) (via electronically) on all parties of record in this cause, this _____ day of _____, 20____

Signature